

EXHIBIT 27

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In Re Bair Hugger Forced)
Air Warming Products Liability)
Litigation)
-----)

LOUIS C. GAREIS

PLAINTIFF

VERSUS

16-CV-4187

3M CO., ET AL.

DEFENDANTS

VIDEOTAPED DEPOSITION
SAID ELGHOBASHI, M.Sc., Ph.D., D.Sc.
Irvine, California
Saturday, February 10, 2018

Reported by:

JENNY S. BOOKER, CSR NO. 9237, RPR, CLR

JOB NO. 137518

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1 A. Correct. Correct.
 2 Q. But -- so do the squames in the 505 model,
 3 do they only stop at the patient's knee and at the
 4 intake to the Bair Hugger device?
 5 A. Correct.
 6 Q. Okay. Do you know -- do you know whether
 7 actual squames have any adhesive properties?
 8 A. I don't know the biological properties of
 9 squames, but it could stick; could not stick. Yeah,
 10 that's not my area.
 11 Q. Okay.
 12 A. Yeah.
 13 Q. So coming back to your estimate of the time
 14 taken by the squames to reach the operating table on
 15 Page 4 of your report --
 16 A. Yes.
 17 Q. -- am I right that this is before the
 18 calculation?
 19 A. Correct.
 20 Q. You estimated that the effect would be
 21 the same but that it would take more time?
 22 A. Correct.
 23 Q. Okay. What if the flow rate was reduced
 24 to 25 CFMs? Would you also estimate that the
 25 results would be the same, it would just take more

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1 time?
 2 A. Correct.
 3 Q. All right. What if the flow rate were
 4 reduced to 15 CFMs?
 5 A. Same.
 6 Q. Same.
 7 What if it were reduced to 1 CFM?
 8 A. That's no motion. 1 CFM like very --
 9 nothing.
 10 Q. Okay. Okay. So you need to have enough
 11 motion --
 12 A. Yeah.
 13 Q. -- to move the squames; is that right?
 14 A. Correct. Right. Because you have the
 15 grilles in the ceiling, the flow in the room is
 16 always turbulent. Never trust anybody that says
 17 laminar flow. There is no laminar flow, period.
 18 Q. That's one thing I feel like I've finally
 19 learned. Okay.
 20 A. So this is important. That mean the
 21 turbulent eddies I showed in the previous eddies --
 22 Q. Yes.
 23 A. -- the large eddies --
 24 Q. Yes.
 25 A. -- will scavenge whatever in the floor,

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1 bring it up or something.
 2 Q. Okay.
 3 A. What happens to the Bair Hugger heated
 4 air is that it enhances that process, because hot
 5 air could rise above the floor.
 6 Q. Okay.
 7 A. That's --
 8 Q. So what if -- all right. So what if we
 9 reduced the --
 10 MR. ASSAAD: Just -- Corey, that's kind of
 11 distracting, you clipping your nails. Could you
 12 just --
 13 MR. GORDON: I wasn't clipping.
 14 MR. ASSAAD: Or you're clipping something.
 15 So that noise is just distracting. I'm not upset.
 16 I'm just saying, can we just wait till a break?
 17 MR. GORDON: All right.
 18 BY MR. GOSS:
 19 Q. Okay. So I understand what you're saying,
 20 that the heated air enhances the process?
 21 A. Correct.
 22 Q. So if we reduced the temperature from
 23 45 -- 40.5 C down to, say, 35, would you expect the
 24 same thing to occur, it would just take --
 25 A. Okay.

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1 Q. -- more time?
 2 A. Okay.
 3 MR. ASSAAD: Objection to form. Irrelevant
 4 hypothetical.
 5 THE WITNESS: Okay. For -- for a lump
 6 of air -- lump of air to rise a distance, it's
 7 buoyancy rate. So it rises because something called
 8 rho cold minus rho hot sine gravity of acceleration.
 9 BY MR. GOSS:
 10 Q. Okay. Rho cold --
 11 A. Minus rho hot --
 12 Q. -- minus rho hot --
 13 A. -- time gravity gives a force that lifts
 14 that up.
 15 Q. That's the buoyant force?
 16 A. Yes.
 17 Q. Okay.
 18 A. So this rho cold will be 16 degrees
 19 centigrade. Rho hot, 39.
 20 Q. Okay.
 21 A. So the hot -- this -- once you have
 22 temperature gradient, 16 in the room, air conditioning
 23 16, if you put 32, 37, 39, 40, big difference. This
 24 is like 22 centigrade difference. Delta Lt is the
 25 gradient.